



August 7, 2013
Federal Communications Commission 445 12th Street, S.W.
Washington, D.C. 20554

Re: In the Matter of Accessibility of User Interfaces, and Video Programming Guides and Menus, MB Docket No. 12-108, Notice of Proposed Rulemaking (FCC 13-77)

Dear Commissioners:

The Community Media Center of Marin submits this letter in the above-referenced rulemaking proceeding (NPRM) in support of the comments filed by the Alliance for Community Media; the Alliance for Communications Democracy; Montgomery County, Maryland; and the National Association of Counties, National Association of Telecommunications Officers and Advisors & U.S. Conference of Mayors.

The Community Media Center of Marin (CMCM) administers the three PEG cable channels for Marin County California, serving over 250,000 residents. CMCM schedules more than 20,000 hours annually of community, educational and governmental programming across our three channels.

We carry a number of regular series on our channels which are closed captioned such as Democracy Now, Nasa TV, UCTV and Link programming. The onscreen video programming guide of our multichannel video programming distributor (MVPD), Comcast, does not provide a label or symbol indicating that this program has closed captions though we pay for the cable guide service. The other (MVPD) in our area, AT&T, provides no closed captioning nor a guide to indicate what program is airing or whether it is captioned.

We have program descriptions and accessibility information readily available for our programs with accessibility options such as closed captions. However, AT&T lists none of this information in their channel 99 offering. This level of information is inadequate to meet the accessibility goals of the Twenty-First Century Communications and Video Accessibility Act of 2010. Viewers cannot determine from the MVPD's video programming guide what our programs are and whether our programs are accessible. Thus, viewers with visual or auditory disabilities cannot make meaningful video program choices. In addition, viewers also cannot schedule their DVRs to record specific programs – further marginalizing the local channel content we offer.

AT&T's U-verse multichannel video service has created unique and especially difficult problems for visually-impaired viewers wishing to view PEG channel programming that are discussed in the comments filed by the Alliance for Communications Democracy, the Alliance for Community Media, and Chicago Access Corporation (CAN TV). Unlike the linear PEG channels on our incumbent cable operator's system, which the visually impaired can reach simply by remembering the right channel number (26, 27, 30). With AT&T's PEG product the visually impaired must somehow, after punching

in channel 99, figure out how to visually navigate a series of menus and sub-menus just to reach any of our PEG channels. The more PEG channels in the DMA and the more PEG channels in each jurisdiction, the more sub-menus the visually impaired must somehow figure out how to “see” and navigate. In our area, AT&T has dozens of different local jurisdictions, and a long list of different PEG channels, on its “channel 99” PEG application. As a result, a visually-impaired subscriber, after inputting channel 99 and waiting for it to load, must somehow visually navigate a menu of dozens of different local community jurisdictions and find and press the correct one, and then after that, visually navigate a sub-menu of these different PEG channels, and find and press the correct one, to reach our PEG channel. Moreover, AT&T PEG product’s lack of a truly effective “last channel” function for PEG creates yet more problems for the visually impaired if they wish to go to or from a PEG channel from or to a non-PEG channel to another.

CMCM received numerous complaints from Comcast subscribers requesting guide information, something we were eventually able to provide after more than a year delay by that MVPD in securing the paid service. In the case of AT&T, few subscribers even know the three CMCM PEG channels even exist on the U-verse system unless we inform them. This means AT&T viewers miss out on county and local municipal meetings, local emergency preparedness videos as well as thousands of hours of other locally relevant programs.

We urge the Commission to adopt rules that would require video programming guides and menus which display channel and program information include, for all channels, high level channel and program descriptions and titles, as well as a symbol identifying the programs with accessibility options (captioning and video description).

Thank you for the opportunity to submit these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Eisenmenger".

Michael Eisenmenger
Executive Director

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